

BEFORE THE  
POSTAL REGULATORY COMMISSION  
WASHINGTON, D.C. 20268-0001

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COMPETITIVE PRODUCT PRICES  
GLOBAL PLUS 3 CONTRACTS (MC2016-152)  
NEGOTIATED SERVICE AGREEMENTS

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Docket No.  
CP2016-221

**MOTION FOR TEMPORARY RELIEF CONCERNING NOTICE OF THE  
UNITED STATES POSTAL SERVICE OF FILING MODIFICATION TO  
GLOBAL PLUS 3 NEGOTIATED SERVICE AGREEMENT**  
(June 30, 2016)

The Postal Service files this motion to seek clarification that the modification filed on June 30, 2016,<sup>1</sup> for the Global Plus 3 contract that is the subject of this docket, may go into effect on July 1, 2016, even while any review of the modification is pending. Absent the modification going into effect on July 1, 2016, there may be serious disruption in the service, because some customers that have recently signed Global Plus 3 or Global Plus 1C contracts, which were filed with the Commission prior to June 15, 2016, will have contracts that go into effect on July 1, 2016, while others will not. Moreover, there are some customers that have yet to sign a Global Plus 1C agreement, despite efforts to secure timely execution before June 15, 2016. The resulting impact could be that some customers are unable to access discounted Global Plus rates absent the ability to link. The Postal Service accordingly urges the Commission to treat the modification that the Postal Service filed in this docket as effective on July 1, 2016.

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<sup>1</sup> Notice of the United States Postal Service of Filing Modification to Global Plus 3 Negotiated Service Agreement, Docket No. CP2016-221, June 30, 2016.

As background, the Global Plus 1C contract with the same customer filed in Docket No. CP2015-66 did allow for permit linking, but without the modification, the agreement that is the subject of this docket does not allow for permit linking. The Postal Service has recently filed a substantial number of Global Plus 1C contracts with various customers, some of whom previously linked their permits to the Global Plus 1C contract filed in Docket No. CP2015-66. The first such Global Plus 1C contract was filed on June 7, 2016, concerning which the Commission issued an order on the afternoon of June 29, 2016.<sup>2</sup> Including that contract, the Postal Service filed eighteen similar Global Plus 1C contracts at the Commission by June 15, 2016. Almost all of the customers for those eighteen contracts linked their permits to one of the three Global Plus 1C contracts that are the subject of Docket Nos. CP2015-66, CP2015-68, and CP2015-70.

Despite the Postal Service's best efforts, not all customer agreements were filed with the Commission before June 15, 2016, fifteen days prior to the expected start date of July 1, 2016. Moreover, as mentioned above, not all agreements with the existing customers have been executed. As a result, as of July 1, 2016, not all of the existing customer base may have access to discounted prices under their own Global Plus 1C agreements. This may cause serious market disruption. Furthermore, as of July 1, 2016, those customers whose permits are linked to the predecessor CP2015-66 agreement will not be able to link their permits to the agreement that is the subject of this docket absent the effectiveness of the modification that allows permit linking on a temporary, emergency basis. Further, it is ideal to have as many customers initiated at the new rates, rather than attempting to perpetuate former agreements.

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<sup>2</sup> Order Adding Global Plus 1D to the Competitive Product List and Approval of Designation as Baseline Agreement, Docket No. CP2016-193, June 29, 2016.

Therefore, the Postal Service requests that the Commission clarify that the modification that the Postal Service filed in this docket may go into effect on July 1, 2016, when the agreement filed in this docket goes into effect.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

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